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Bankruptcy Conflicts-Counsel for Delphi Corporation, et al.,
Debtors and Debtors in Possession
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HEARING DATE: 5/10/2007
AT 10:00 AM

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF JOINT SETTLEMENT AGREEMENT,
STIPULATION AND AGREED ORDER BETWEEN DELPHI AUTOMOTIVE
SYSTEMS, LLC, RSR CORPORATION AND ECO-BAT AMERICA, LLC TO
DISALLOW AND EXPUNGE CLAIM NUMBERS 866 AND 867**

PLEASE TAKE NOTICE that on March 16, 2007, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proofs of claim numbers 866 and 867 (the "Proofs of Claim" or the "Claims") filed by RSR Corporation ("RSR") and Eco-Bat America, LLC ("Eco-Bat" and collectively with RSR "Claimants") pursuant to the Eleventh Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims (B) Claims Not Reflected On Debtors' Books and Records, (C) Untimely Claims, And (D) Claims Subject to Modification (the "Objection") (Docket No. 7301).

PLEASE TAKE FURTHER NOTICE that the Debtors and the Claimants have agreed to settle the Objection with respect to the Proofs of Claim and, pursuant to the Order Under 11 U.S.C. §§ 363, 502, And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 4414), have executed a Joint Settlement Agreement, Stipulation and Agreed Order Between Delphi Automotive Systems, LLC, RSR Corporation and Eco-Bat America, LLC To Disallow and Expunge Claim Numbers 866 and 867 (the "Settlement Agreement and Joint Stipulation").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Settlement Agreement and Joint Stipulation, a true and complete copy is annexed hereto, the Debtors and the Claimants have agreed to disallow and expunge proofs of claim numbers 866 and 867 in their entirety.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the Settlement Agreement and Joint Stipulation for consideration at the hearing scheduled for May 10, 2007, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
April 30, 2007

DELPHI CORPORATION, *et al.*
By their attorneys,
TOGUT, SEGAL & SEGAL LLP
By:

/s/ Neil Berger
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